



U.S. Department of Justice

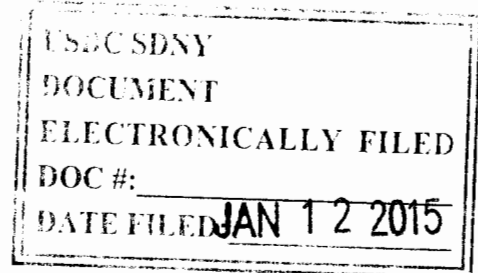
*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 21, 2014

By E-mail

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007



Re: *United States v. Ross William Ulbricht*, S1 14 Cr. 68 (KBF)

Dear Judge Forrest:

The Government writes to inform the Court that the attached superseding indictment (the "Superseding Indictment") was issued today against the defendant. The main change made in the Superseding Indictment consists of the addition of three charges that were not included in the original indictment:

- one substantive count of narcotics trafficking and aiding and abetting narcotics trafficking in violation of Title 21, United States Code, Section 841(a) and Title 18, United States Code, Section 2;
- one substantive count of using the Internet to distribute narcotics and aid and abet the distribution of narcotics, in violation of Title 21, United States Code, Section 841(h); and
- one count of conspiring to traffic in fraudulent identification documents, in violation of Title 18, United States Code, Section 1028(f).

The remaining changes made in the Superseding Indictment are minor and consist of clarifications to the original charges.

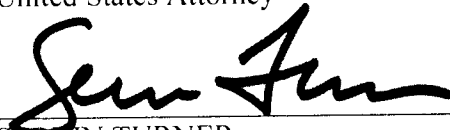
None of the changes reflected in the Superseding Indictment entail the revelation of any new facts or the production or review of any new discovery. The changes are simply intended to ensure that the indictment contains sufficient charging language to cover all aspects of the defendant's criminal conduct that the Government intends to prove at trial. Accordingly, there is no reason why the filing of the Superseding Indictment should affect the trial date in this matter.

The Government respectfully requests that the defendant's arraignment on the Superseding Indictment be scheduled for the same time as the upcoming pretrial conference presently scheduled for September 5, 2014, at 12:00 p.m.

Respectfully,

PREET BHARARA
United States Attorney


By:


SERIN TURNER
Assistant United States Attorneys
Southern District of New York

cc: Joshua Dratel, Esq.

SO ORDERED
this ____ day of August 2014

HON. KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE

Deal with in order
course.


Ordered
Post to locker
K B. Forrest
USDJ
1/12/15